

### **REMARKS**

Applicants thank the Examiner for the courtesies extended during the telephone interview of June 2, 2005. Applicants request that the Examiner carefully consider the foregoing amendments in light of the comments made during the interview and the remarks which follow.

In the Office Action mailed December 29, 2004 (the "Final OA"), claims 1-4, 6-11 and 13-21 stand rejected under 35 U.S.C. § 102 as being allegedly anticipated by U.S. Patent No. 6,580,870 to Kanazawa et al. ("Kanazawa") and claims 5 and 12 stand rejected under 35 U.S.C. § 103 as being allegedly anticipated by Kanazawa in view of U.S. Patent No. 6,173,406 to Wang et al. ("Wang").

Applicants respectfully request reconsideration of the present application based on the foregoing amendments and the following remarks. In the Advisory Action of June 13, 2005, the Examiner declined to enter amendments to the claims provided by Applicants in an after-final Amendment. Applicants request entry of amendments provided in this response rather than those of the After-Final Amendment. Mindful of the Examiner's position during the Interview, Applicants have cancelled claims 2, 10 and 17-18 and have amended claims 1, 3, 7-9, 11, 13, 16 and 19 to recite aspects of the invention with more particularity. The amendments are fully supported by the Specification, for example at page 5, line 1 – page 6, line 15. Accordingly, no new matter is introduced in this Amendment. Upon entry of the amendment, claims 1, 3-9, 11-16 and 19-21 will be pending in the application.

#### ***Interview Summary***

In the Interview there was a discussion of the Examiner's characterization of "DVD Text Data" parser as evidenced in the outstanding . The Examiner read the term "DVD Text Data" as essentially a URL stored in a data stream on a DVD. This construction combined with a reading of Kanazawa's Navigation manager and presentation engine was presented as the basis of rejection of the claims in the present Application. Applicants respectfully submit that, as amended, the claims are patentable over Kanazawa and Wang.

### ***Claim Objections***

The Final Office Action objected to the “button number message” in claim 7 relying on the label “EC\_DVDButton\_Change\_Message” shown at step 120 of Figure 3. Applicants restate the arguments related to the objection as provided in prior responses and incorporate those arguments herein by reference. Specifically, Applicants stated previously that “[i]t is apparent from the text that the EC\_DVDButton\_Change\_Message is one example of a message sent in response to activation of one of the display buttons...” Applicants referred the Examiner to the Specification at page 4, lines 9-19 which includes the following:

When this occurs, the media player 80 generates a Windows event message such as EC\_DVD\_Button\_Change signifying that a particular button has been selected or actuated and providing its number (Step 120).

(Specification, Page 4, lines 15-17, emphasis added). Thus, the Specification provides EC\_DVD\_Button\_Change as one example of a Windows event message that signifies selection of or actuation of a button, the button identified by a number. Figure 3 merely illustrates this one example in which an EC\_DVDButton\_Change message is sent. Further, the Specification explicitly teaches that a particular button’s number is indicated in a Windows event message. Therefore, Applicants respectfully submit that claim 7 as drafted is consistent with the drawings and the Specification. Applicants respectfully submit that it is apparent that the claim recitation of “a button number message” is appropriate, consistent with, and fully supported by, the Specification and Applicants request withdrawal of the objection.

### ***Claim Rejections under 35 U.S.C. § 102***

In the Final Office Action, claims 1-4, 6-11 and 13-21 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,580,870 to Kanazawa et al. (“Kanazawa”). Claims 2, 10, and 17-18 have been canceled and the rejections of these claims are therefore moot. Applicants restate the arguments opposing the rejections that were provided in earlier communications including the response filed on March 29, 2005 and incorporate those arguments herein by reference. Nevertheless, Applicants have amended the claims to, *inter alia*, move certain limitations of dependent claims into the independent claims. Applicants have further amended the claims to more clearly recite various elements of the claims. No new issues

arise from the amendments. Applicants respectfully submit that these amendments reduce the issues for appeal by further distinguishing the claims from the prior art.

The present invention provides a highly flexible system that adapts to provide URL information based on various contexts. The present invention employs specially authored information provided in certain DVD-standard data structures to provide context sensitive responses to various events. As recited in various of the claims, embedded commands can cause a DVD-standard General Parameter register (GPRM) to be populated with indicia of current play position. It will be readily appreciated that such current play position, in conjunction with the TXTDT\_MG provides access to URLs based on context of playback (see incorporated U.S. Patent No. 6,453,459). Kanazawa embeds URLs in a sequential data stream and does not obtain URLs by looking up an authored data structure. Specifically, Kanazawa does not teach a system, method or apparatus utilizing a DVD authored by an authoring system that provides embedded commands for writing indicia of current position of play as required by the independent claims of the present application. Nor does Kanazawa disclose, anticipate, or suggest the use of a DVD Text Data parser as required by the claims of the present application.

Applicants have amended claims 1, 9, and 16 to replace the previously recited “URL deriving means” with “DVD Text Data parser” as previously recited in the herewith-cancelled claims 2, 10 and 17, respectively. For consistency, claim 13 has been similarly amended. Applicants respectfully submit that the explicit requirement for a DVD Text Data parser even more clearly distinguishes the claimed invention from the prior art.

Applicants direct the Examiner’s attention to the “Guidebook for DVD-Video Text Data Usage,” published by the DVD Forum (hereinafter referred to as “The DVD Forum Publication”), DVD Text Data is described (see for example, DVD Forum Publication at Chapter 3, pages 7-10). As evidenced by the DVD Forum Publication, DVD Text Data is known to those skilled in the DVD authoring art and the data structures and parsers recited in the claims have specific meaning not taught by Kanazawa.

It is readily apparent that DVD Text Data is not taught by Kanazawa. The rejections of previous of claims 2, 10 and 17 in the Final Office Action are based on the propositions that (1) a URL is a text-based address, (2) Kanazawa’s URLs are received from a DVD and can therefore be construed as DVD Text Data, and (3) a combination of Kanazawa’s Navigation manager and presentation engine is equivalent to – or somehow suggests – a DVD Text Data parser (See Final

Office Action at page 4, first full paragraph). None of these propositions withstands close inspection considering that:

- while a URL may indeed be a textual representation of a Web address, no reasonable grounds exist for equating a URL with DVD Text Data residing in a DVD's content data structure; for example, unlike Kanazawa's URLs, DVD Text Data can be characterized by content type and by location within a DVD logical structure or data stream (see DVD Forum Publication at page 4, section 2.1)
- while Kanazawa may obtain URL's from a DVD, Kanazawa does not explicitly teach DVD Text Data, a DVD Text Data Structure or the storing of URLs in the DVD Text Data, but merely teaches that URLs can be embedded in VTSI data as discussed in Applicants response to the Office Action mailed 2/5/2004
- Kanazawa's Navigation manager is taught as having the function of interpreting navigation data (Kanazawa, col. 11, lines 16-29), where URLs are regarded as commands; thus, any inference of parsing can only reasonably be drawn to the parsing of commands for discerning the substance of the command. One of ordinary skill in the art would not link a URL parser to a DVD Text Data parser because, for example, URLs are not data structures having characteristics and elements that are defined and managed by an industry standards body
- Kanazawa's presentation engine merely "effects title playback of moving pictures according to the instruction given by the navigation manager" and is therefore better described as a media player, not a DVD Text Data parser as recited in the claims (see col. 11, lines 40-42).

In contrast to Kanazawa, the claims of the present application require a DVD Text Data parser for *inter alia* parsing a DVD Text Data Structure to derive URLs. Kanazawa does not explicitly teach the parser or the DVD Text Data. Even if the Navigation Manager of Kanazawa could be inferred to include text parsing and the presentation manager could be construed as a video data parser, there is no reasonable basis for further stretching an interpretation of these inferred meanings to conclude that Kanazawa "clearly anticipates ... A Text Information Parser," as asserted by the Final Office Action. Kanazawa does teach explicitly or through inference and construction, **DVD Text Data** or a **parser** capable of parsing "DVD Text Data" and the rejection of the claims is viable only if the existence or meaning of DVD Text Data is denied. The DVD

Forum Publication confirms and defines the existence and meaning of DVD Text Data in the art and, consequently, Kanazawa cannot reasonably be considered to anticipate each and every element of the presently claimed subject matter. Therefore, Applicants respectfully request withdrawal of the rejections of amended claims 1, 9, 13 and 16 and their respective dependent claims.

Claims 5 and 12 and 46-51 stand rejected as being obvious over Kanazawa in view of U.S. Patent No. 6,580,870 to Wang et al. ("Wang"). These claims depend ultimately from amended independent claims 1 and 9 and thus are patentable for at least the reasons presented above. The deficiencies noted above are not cured by the alleged combination with Wang. Accordingly, the rejections of these claims should be withdrawn.

All objections and rejections having been addressed, and in view of the foregoing arguments, the claims are believed to be in form for allowance, and such action is earnestly solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to contact the undersigned at the telephone number listed below. Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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